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US DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

CASE 17-CR-350-1 (KF)

VS

RAZDHAN SHULAYA

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**NOTICE OF INTENT TO CALL EXPERT TO ESTABLISH AFFIRMATIVE  
DEFENSE of ENTRAPMENT PURSUANT TO RULE 16**

**PLEASE TAKE NOTICE**, that Razdhan Shulaya, through his attorney Chris Shella, gives notice that he plans to call an expert to testify that the US Government's indictment against my client is based on entrapment.

This expert witness is necessary for the defense to meet its burden of production of evidence to support this complete defense. The defendant must show: 1. That he was induced into the act and 2. That he lacked the predisposition to commit this crime. (Mathews v. United States, 485 U.S. 58, 62–63 (1988)).

Rule 16 of the Federal Rules of Criminal Procedure requires the disclosure of our intent to use such expert

Dated: Uniondale, New York  
October 16, 2017

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